REMARKS

Claims 1-10 were examined and rejected. Applicants amend claims 1-2, 4-5, 8 and 10. Applicants respectfully request reconsideration of pending claims 1-10, as amended, in view of at least the following remarks.

I. Claims Rejected Under 35 U.S.C. §102

Claim 1 is rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,475,255 issued to Joardar et al. (<u>Joardar</u>). It is axiomatic that to be anticipated, every element of a claim must be disclosed within a single reference.

Applicants respectfully disagree with the rejection of independent claim 1 and submit that claim 1, as amended, is allowable for at least the reason that <u>Joardar</u> does not describe that "a first protective structure and a second protective structure <u>surround and enclose respective ones of the plurality of signal lines</u>," as required by amended independent claim 1.

<u>Ioardar</u> describes noise isolation ring 104 around noisy circuit element 102, noise isolation ring 105 partially around noise isolation ring 104 and noisy circuit element 208, noise isolation ring 107 around noisy circuit element 103, and noise isolation ring 106 partially around noise isolation ring 107. (See Abstract and Figures 1-2).

Consequently, the Patent Office has not identified and Applicants are unable to find any description in <u>Joardar</u> of a first protective structure and a second protective structure <u>surround and enclose respective ones of the plurality of signal lines</u>, as required by Applicants' amended claim 1. Hence, applicants respectfully request the Patent Office withdraw the rejection identified above for amended claim 1.

Applicants submit that dependent claims 2-3 being dependent upon allowable base claim 1, as amended, are patentable over the cited references for at least the reasons explained above. Thus, Applicants respectfully request that the Patent Office withdraw the rejection of dependent claims 2-3 under 35 U.S.C. § 102(b) as being anticipated by <u>Joardar</u>.

Claims 1-7 and 10 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,078,068 issued to Tamura (<u>Tamura</u>). It is axiomatic that to be anticipated, every element of a claim must be disclosed within a single reference.

Applicants respectfully disagree with the rejection of independent claim 1 and submit that claim 1, as amended, is allowable for at least the reason that <u>Tamura</u> does not describe "a first protective structure and a second protective structure that <u>surround and enclose respective ones of the plurality of signal lines</u>," as required by amended independent claim 1.

<u>Tamura</u> describes electrostatic discharge bus 120 and die edge seal metallization 122 around core logic 102 and proximate to the edge of die 100. (See Abstract and Figure 1A).

Consequently, the Patent Office has not identified and Applicants are unable to find any description in <u>Tamura</u> of a first protective structure and a second protective structure <u>surround and enclose respective ones of the plurality of signal lines</u>, as required by Applicants' amended claim 1. Hence, applicants respectfully request the Patent Office withdraw the rejection identified above for amended claim 1.

Applicants submit that dependent claims 2-7 and 10 being dependent upon allowable base claim 1, as amended, are patentable over the cited references for at least the reasons explained above. Thus, Applicants respectfully request that the Patent Office withdraw the rejection of dependent claims 2-7 and 10 under 35 U.S.C. § 102(b) as being anticipated by <u>Tamura</u>.

II. Claims Rejected Under 35 U.S.C. §103

Claims 8 and 9 are rejected under 35 U.S.C. §103(a) as being unpatentable over <u>Tamura</u> in view of U.S. Patent No. 4,841,354 issued to Inaba (<u>Inaba</u>).

Applicants submit that dependent claims 8 and 9 being dependent upon allowable base claim 4, as amended, are patentable over the cited references for at least the reasons explained above. Thus, Applicants respectfully request that the Patent

Office withdraw the rejection of dependent claims 8 and 9 under 35 U.S.C. § 103(a) as being unpatentable over <u>Tamura</u> in view of <u>Inaba</u>.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees. If a telephone interview would expedite the prosecution of this Application, the Examiner is invited to contact the undersigned at (310) 207-3800.

Respectfully submitted,

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Dated: August 2, 2004

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Nadya Gorden